

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION AND [PROPOSED]  
ORDER REGARDING COMPENSATION  
INFORMATION FOR META  
DEPONENTS**

**STIPULATION**

The Personal Injury (“PI”), School District and Local Government Entity (“SD”), and Attorney General (“AG”) Plaintiffs (collectively “Plaintiffs”) and Meta (Plaintiffs and Meta together, the “Parties”) hereby stipulate as follows:

1. At the November 21, 2024, Discovery Management Conference, the Court directed the  
2 Parties to meet and confer on the deponent compensation dispute. Since then, the Parties have continued  
3 to work together on this issue, meeting and conferring to come to a resolution.

2. To that end, the Parties have agreed, pending the Court’s consent, that Meta will conduct  
3 a reasonable investigation into whether at any point during the Relevant Time Period (January 1, 2012  
4 through April 1 2024), there was a discrepancy between (a) the Bonus Compensation given to any of the  
5 following 11 deponents and (b) the Bonus Compensation Policy Meta has produced to Plaintiffs in  
6 discovery in this litigation (META3047MDL-029-00000008-00000011):

- a. M.B
- b. A.D.
- c. W.G.
- d. V.J.
- e. R.S
- f. S.B.
- g. K.J.
- h. K.N.
- i. P.R.
- j. G.R.
- k. M.R.

3. If Meta identifies any such discrepancy in Bonus Compensation for any of the above eleven  
4 deponents during the Relevant Time Period, it will notify Plaintiffs’ counsel and will produce documents  
5 sufficient to show the total amount(s) of Bonus Compensation Meta provided to that deponent for the  
6 bonus period(s) when the discrepancy occurred.

4. Meta agrees to identify any such discrepancies and produce documents sufficient to show the total Bonus Compensation for each time period where the discrepancy occurred 7 days before any noticed deposition.

5. For depositions noticed for less than 14 days from the entry of this order, Meta agrees to identify any such discrepancy and produce documents sufficient to show the total Bonus Compensation for each time period where the discrepancy occurred at least 48 hours ahead of the noticed deposition.

6. Where the deposition has already occurred, Meta agrees to identify any discrepancy and produce documents sufficient to show total Bonus Compensation for each time period where the discrepancy occurred within 30 days of the entry of this order.

## [PROPOSED] ORDER

7. In accordance with the Parties' stipulated agreement, the Court hereby ORDERS Meta to conduct a reasonable investigation into whether at any point during the Relevant Time Period (January 1, 2012 through April 1, 2024), there was a discrepancy between (a) the Bonus Compensation given to any of the following 11 deponents and (b) Meta's Bonus Compensation Policy:

- a. M.B.
  - b. A.D.
  - c. W.G.
  - d. V.J.
  - e. R.S
  - f. S.B.
  - g. K.J.
  - h. K.N.
  - i. P.R.
  - j. G.R.
  - k. M.R.

8. The Court further ORDERS Meta to identify the fact of any Bonus Compensation discrepancy for the 11 deponents to Plaintiffs' Counsel and to produce documents sufficient to show the

1 total amount(s) of the Bonus Compensation for the bonus period(s) when the discrepancy occurred  
2 according to the schedule set forth above.  
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4 **IT IS SO ORDERED.**

5 Dated: December \_\_\_, 2024

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7 MAGISTRATE JUDGE PETER H. KANG  
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1 DATED: December 11, 2024

2 By: /s/ Lexi J. Hazam

3 LEXI J. HAZAM  
4 **LIEFF CABRASER HEIMANN &**  
5 **BERNSTEIN, LLP**  
6 275 BATTERY STREET, 29TH FLOOR  
7 SAN FRANCISCO, CA 94111-3339  
8 Telephone: 415-956-1000  
9 lhazam@lchb.com

10 PREVIN WARREN  
11 **MOTLEY RICE LLC**  
12 401 9th Street NW Suite 630  
13 Washington DC 20004  
14 Telephone: 202-386-9610  
15 pwarren@motleyrice.com

16 Co-Lead Counsel

17 CHRISTOPHER A. SEEGER  
18 **SEEGER WEISS, LLP**  
19 55 CHALLENGER ROAD, 6TH FLOOR  
20 RIDGEFIELD PARK, NJ 07660  
21 Telephone: 973-639-9100  
22 cseeger@seegerweiss.com

23 Counsel to Co-Lead Counsel

24 JENNIE LEE ANDERSON  
25 **ANDRUS ANDERSON, LLP**  
26 155 MONTGOMERY STREET, SUITE 900  
27 SAN FRANCISCO, CA 94104  
28 Telephone: 415-986-1400  
jennie@andrusanderson.com

21 Liaison Counsel

22 EMILY C. JEFFCOTT  
23 **MORGAN & MORGAN**  
24 633 WEST FIFTH STREET, SUITE 2652  
25 LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

26 JOSEPH VANZANDT  
27 **BEASLEY ALLEN**  
28 234 COMMERCE STREET  
MONTGOMERY, LA 36103

1 Telephone: 334-269-2343  
2 joseph.vanzandt@beasleyallen.com

3 Federal/State Liaisons

4 MATTHEW BERGMAN  
5 GLENN DRAPER  
6 **SOCIAL MEDIA VICTIMS LAW CENTER**  
7 821 SECOND AVENUE, SUITE 2100  
8 SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org  
glenn@socialmediavictims.org

9 JAMES J. BILSBORROW  
10 **WEITZ & LUXENBERG, PC**  
11 700 BROADWAY  
12 NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

13 JAYNE CONROY  
14 **SIMMONS HANLY CONROY, LLC**  
15 112 MADISON AVE, 7TH FLOOR  
16 NEW YORK, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

17 ANDRE MURA  
18 **GIBBS LAW GROUP, LLP**  
19 1111 BROADWAY, SUITE 2100  
20 OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

21 ALEXANDRA WALSH  
22 **WALSH LAW**  
23 1050 Connecticut Ave, NW, Suite 500  
24 Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

25 MICHAEL M. WEINKOWITZ  
26 **LEVIN SEDRAN & BERMAN, LLP**  
27 510 WALNUT STREET  
28 SUITE 500  
PHILADELPHIA, PA 19106

1 Telephone: 215-592-1500  
2 mweinkowitz@lfsbalw.com

3 Plaintiffs' Steering Committee Leadership

4 RON AUSTIN  
5 **RON AUSTIN LAW**  
6 400 MANHATTAN BLVD.  
7 HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

8 PAIGE BOLDT  
9 **WALSH LAW**  
10 4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
11 Telephone: 210-448-0500  
PBoldt@alexwalshlaw.com

12 THOMAS P. CARTMELL  
13 **WAGSTAFF & CARTMELL LLP**  
14 4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
15 Telephone: 816-701-1100  
tcartmell@wcllp.com

16 SARAH EMERY  
17 **HENDY JOHNSON VAUGHN EMERY PSC**  
18 600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
19 Telephone: 859-600-6725  
semery@justicestartshere.com

20 CARRIE GOLDBERG  
21 **C.A. GOLDBERG, PLLC**  
16 Court St.  
22 Brooklyn, NY 11241  
23 Telephone: 646-666-8908  
carrie@cagoldberglaw.com

24 RONALD E. JOHNSON, JR.  
25 **HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
26 LOUISVILLE, KT 40202  
Telephone: 859-578-4444  
27 rjohnson@justicestartshere.com

1 SIN-TING MARY LIU  
2 **AYLSTOCK WITKIN KREIS &**  
3 **OVERHOLTZ, PLLC**  
4 17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com  
5

6 JAMES MARSH  
7 **MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR  
8 NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com  
9

10 JOSEPH E. MELTER  
11 **KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
12 RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com  
13

14 HILLARY NAPPI  
15 **HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
16 New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com  
17

18 EMMIE PAULOS  
19 **LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
20 PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com  
21

22 RUTH THI RIZKALLA  
23 **THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
24 MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com  
25

26 ROLAND TELLIS  
27 DAVID FERNANDES  
28 **BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600

1 Encino, CA 91436  
2 Telephone: 818-839-2333  
3 rtellis@baronbudd.com  
dfernandes@baronbudd.com

4 MELISSA YEATES  
5 **KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
6 RADNOR, PA 19087  
Telephone: 610-667-7706  
7 myeates@ktmc.com

8 DIANDRA "FU" DEBROSSE ZIMMERMANN  
9 **DICELLO LEVITT**  
505 20th St North  
10 Suite 1500  
Birmingham, Alabama 35203  
11 Telephone: 205-855-5700  
fu@dicellosevitt.com

12 Plaintiffs' Steering Committee Membership

13 *Attorneys for Individual Plaintiffs*

1 **PHILIP J. WEISER**  
2 Attorney General  
3 State of Colorado

4 /s/ Bianca E. Miyata  
5 Bianca E. Miyata, CO Reg. No. 42012,  
6 *pro hac vice*  
7 Senior Assistant Attorney General  
8 Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*  
9 First Assistant Attorney General  
10 Elizabeth Orem, CO Reg. No. 58309  
11 Assistant Attorney General  
12 Colorado Department of Law  
13 Ralph L. Carr Judicial Center  
14 Consumer Protection Section  
15 1300 Broadway, 7th Floor  
16 Denver, CO 80203  
17 Phone: (720) 508-6651  
18 bianca.miyata@coag.gov

19 *Attorneys for Plaintiff State of Colorado, ex rel.*  
20 *Philip J. Weiser, Attorney General*

21 **ROB BONTA**  
22 Attorney General  
23 State of California

24 /s/ Megan O'Neill  
25 Nicklas A. Akers (CA SBN 211222)  
26 Senior Assistant Attorney General  
27 Bernard Eskandari (SBN 244395)  
28 Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**  
Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

---

J. Christian Lewis (KY Bar No. 87109),  
*Pro hac vice*  
Philip Heleringer (KY Bar No. 96748),  
*Pro hac vice*  
Zachary Richards (KY Bar No. 99209),  
*Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*

Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV  
MATTHEW.COCANOUGHER@KY.GOV  
Phone: (502) 696-5300  
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**  
Attorney General  
State of New Jersey

*/s/ Kashif T. Chand*  
Kashif T. Chand (NJ Bar No. 016752008),  
*Pro hac vice*  
Section Chief, Deputy Attorney General  
Thomas Huynh (NJ Bar No. 200942017),  
*Pro hac vice*  
Assistant Section Chief, Deputy Attorney General  
Verna J. Pradaxay (NJ Bar No. 335822021),  
*Pro hac vice*  
Mandy K. Wang (NJ Bar No. 373452021),  
*Pro hac vice*

Deputy Attorneys General  
New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
Kashif.Chand@law.njoag.gov  
Thomas.Huynh@law.njoag.gov  
Verna.Pradaxay@law.njoag.gov  
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey  
Division of Consumer Affairs*

1 COVINGTON & BURLING LLP  
2

3 By: /s/ Ashley M. Simonsen  
4 Ashley M. Simonsen, SBN 275203  
5 COVINGTON & BURLING LLP  
6 1999 Avenue of the Stars  
7 Los Angeles, CA 90067  
8 Telephone: (424) 332-4800  
9 Facsimile: + 1 (424) 332-4749  
10 Email: asimonsen@cov.com

11 Phyllis A. Jones, *pro hac vice*  
12 Paul W. Schmidt, *pro hac vice*  
13 COVINGTON & BURLING LLP  
14 One City Center  
15 850 Tenth Street, NW  
16 Washington, DC 20001-4956  
17 Telephone: + 1 (202) 662-6000  
18 Facsimile: + 1 (202) 662-6291  
19 Email: pajones@cov.com

20 *Attorney for Defendants Meta Platforms, Inc.*  
21 *f/k/a Facebook, Inc.; Facebook Holdings,*  
22 *LLC; Facebook Operations, LLC; Facebook*  
23 *Payments, Inc.; Facebook Technologies, LLC;*  
24 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*  
25 *Zuckerberg*

## ATTESTATION

I, Jennifer Scullion, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1 that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 11, 2024

/s/Jennifer Scullion